

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

KENNETH AND PAMELA PRICE JEAN
Plaintiff,

V.

CITY OF ASHBURNHAM POLICE
DEPARTMENT, CITY OF WINCHENDON
POLICE DEPARTMENT, ROB HARRINGTON,
in his capacity as CHIEF OF THE WINCHENDON
POLICE DEPARTMENT, JACK MURRAY, in his
capacity as CHIEF OF THE ASHBURNHAM
POLICE DEPARTMENT, TODD C. PARSONS,
RAYMOND M. ANAIR, ROBERT BRENNON,
WILLIAM P. GEOFFROY, BRIAN HART,
KEVIN AHEARN, KEVIN E. WOLSKI,
OFFICER JOHN DOE, OFFICER JOHN POE,
Defendants.

CIVIL ACTION NO. 03-12306-FDS

DEFENDANTS' LOCAL RULE 26.1(B)(2) DISCLOSURE

Pursuant to United States District Court Local Rule 26.1(B)(2), the Defendants, City of Ashburnham Police Department, Jack Murray, Todd C. Parsons, Robert Brennan, Brian Hart, and Kevin Ahearn, disclose the following:

- (a) The below-listed persons are now known to Defendants' Counsel to have witnessed the transaction or occurrence giving rise to this litigation or to have substantial discoverable information about the claims and defenses:

Plaintiffs:

1. Kenneth Jean, Plaintiff
2. Pamela Jean, Plaintiff

Exhibit A

Ashburnham Police:

3. Jack Murray, Retired Police Chief, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
4. Robert Brennan, Jr., Sergeant, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
5. Kevin C. Ahearn, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
6. Brian Hart, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
7. Todd Parsons, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
8. Mark Baranowski, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
9. Gregory Gushlaw, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
10. Christopher W. Conrad, Dispatcher/Police Officer, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
11. Robert V. Siano, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
12. Susan Brennan, Dispatcher/Police Officer, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430
13. Wade Wright, Patrolman, Ashburnham Police Department, 12 Memorial Drive, Ashburnham, MA 01430

Winchendon Police:

14. Robert Harrington, Chief, Winchendon Police Department
15. Raymond M. Anair, Police Officer, Winchendon Police Department
16. William P. Geoffrey, Police Officer, Winchendon Police Department

17. Kevin E. Wolski, Police Officer, Winchendon Police Department

Civilian Witnesses:

18. Sandra Senecal, 39 Dinan Drive #39, Gardner, MA (regarding Restraining Orders)
19. Kimberly Matukas, 79 Oak Street, Gardner, MA 01440 (regarding Larceny Under \$250 Complaint 10/17/99)
20. Steve Duprey, 725 Spring Street, Winchendon, MA 01475 (regarding Pamela Jean D.U.I. 5/23/01)
21. Proprietors of Toy Town Liquors, Winchendon, MA (regarding Pamela Jean Arrest 5/23/01)
22. Harry P. Butland, 89 Eli Drive, Winchendon, MA 01475 (regarding Vehicle at House Fire 12/14/01)
23. Employees of Boutwell's Towing, 73 Fitchburg Road, Ashburnham, MA 01430 (regarding Various Tows of Plaintiffs' Vehicles)
24. Kenneth Holmquist, 142 Ashby Road, Ashburnham, MA 01430 (regarding House Fire 12/14/01 and Other Observations of Neighbors)
25. Gordon W. Balzer and Francis Balzer, 143 Ashby Road, Ashburnham, MA 01430 (regarding Observations of Neighbors)
26. Walter Romanson and Mary Romanson, 137 Ashby Road, Ashburnham, MA 01430 (regarding Observations of Neighbors)

Ashburnham Fire Department Personnel:

27. Jerry Descoteauz, Department Chief, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
28. John Bresnahan, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
29. John Enright, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
30. Reynold Forest, Ashburnham Fire Department, 3 Central Street, Ashburnham,

MA 01430

31. Jason Godin, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
32. Kent Klingenberg, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
33. Michael Motta, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
34. Michael Dvaska, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
35. Travis Walcourt, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
36. Mark Anderson, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
37. Richard Mayne, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
38. Kimberly McGowan, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
39. William Nolan, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
40. Bruce Wallace, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
41. Michael Ambrozewicz, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
42. Michael Dufault, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
43. Timothy Hill, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
44. Keith Sears, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430

- 45. Joseph Olivari, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
- 46. Raymond Page, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430
- 47. Denise Salo, Ashburnham Fire Department, 3 Central Street, Ashburnham, MA 01430

Other Public Officials/Safety Officers:

- 48. J. Swenson, Emergency Medical Technician, Central Mass. E.M.S. Corp., 361 Holden Street, Holden, MA (regarding EMS Rune 12/14/01)
- 49. B. Fields, Emergency Medical Technician, Central Mass. E.M.S. Corp., 361 Holden Street, Holden, MA (regarding EMS Rune 12/14/01)
- 50. Jennifer Whitaker, Bail Commissioner, Winchendon District Court (regarding Bail Set 12/14/01)
- 51. David Caputi, Bail Commissioner, Winchendon District Court (regarding Bail Set 4/27/02)
- 52. Gloria Cormier, Bail Commissioner, Winchendon District Court (regarding Bail Set 10/2/99)
- 53. Various Medical Providers for Plaintiff.

The Defendants reserve the right to supplement these disclosures.

- (b) The below-listed opposing parties and agents of the opposing parties have made statements concerning the subject matter of this litigation that have been obtained by the Defendants.

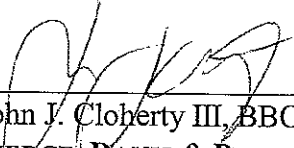
Please see those documents produced pursuant to Local R. 26.2(A) for copies of police reports and other records containing statements by Plaintiffs.

- (c) The below-listed government agencies or officials are now known to Defendants'

Counsel to have investigated the subject matter of this litigation.

Ashburnham Police Department; Winchendon Police Department.


Respectfully Submitted,
The Defendants,
CITY OF ASHBURNHAM POLICE DEPARTMENT, JACK
MURRAY, TODD C. PARSONS, ROBERT BRENNAN,
BRIAN HART, AND KEVIN AHEARN,
By Their Attorneys,



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(617) 350-0950

CERTIFICATE OF SERVICE

I hereby certify that on this day a true copy of the
above document was served upon the attorney of
record for each party by mail ~~by hand~~.

11/29/04 
Date